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8 *Attorneys for Defendant State Farm Mutual*
Automobile Insurance Company

9
10 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA, SOUTHERN DIVISION

11 ***

12 ROSE DESIO,
13
14 Plaintiff,
15
16 vs.
17 STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY; DOES I-V and
18 ROES VI-X, inclusive
Defendants.

CASE NO. 2:20-cv-1486-APG-NJK

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO FILE
RESPONSE TO PLAINTIFF'S MOTION
FOR PARTIAL SUMMARY JUDGMENT**

[Third Request]

19 DEFENDANT STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY
20 ("Defendant"), by and through its counsel of record, the law firm of LEWIS BRISBOIS
21 BISGAARD & SMITH LLP, and PLAINTIFF ROSE DESIO ("Plaintiff"), by and through her
22 counsel of record, JESSE SBAIH & ASSOCIATES, LTD., hereby stipulate and agree that the
23 time for Defendant to file its Response to Plaintiff's Motion for Partial Summary Judgment be
24 extended as set forth herein. Defendant State Farm's Response is currently due December 21,
25 2020. The parties hereby stipulate that the due date for Defendant's Response be extended to
26 January 1, 2021.

27 **Reason for Extension**

28 Plaintiff's Motion for Partial Summary Judgment addresses a nuanced issue of law

1 regarding the enforceability of Defendant's anti-stacking provision in the Nevada Car Policy it
2 issued to Plaintiff. Defendant requires additional time to address Plaintiff's claims effectively
3 prior to filing its Response. This stipulation is made in good faith and not for the purpose of
4 delay.

5 This is the third extension of time requested for filing Defendant's Response to Plaintiff's
6 Motion for Partial Summary Judgment.

7 DATED this 21th day of December, 2021.

DATED this 21th day of December, 2021.

8 LEWIS BRISBOIS BISGAARD & SMITH

JESSE SBAIH & ASSOCIATES, LTD.

9 /s/ Tara U. Teegarden

/s/ Jesse M. Sbaih

10 ROBERT W. FREEMAN
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14 Attorneys for Defendant

The District at Green Valley Ranch
170 South Green Valley Parkway, Suite 280
Henderson, Nevada 89012

Attorneys for Plaintiff

15
16 **ORDER**

17 IT IS SO ORDERED.

18 Dated this 22nd day of December, 2020.

19
20 
U.S. DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 21th day of December, 2020, I electronically filed the foregoing **THIRD STIPULATION AND ORDER FOR EXTENSION OF TIME TO FILE RESPONSE TO PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT** with the Clerk of the Court through Case Management/Electronic Filing System.

Jesse M. Sbaih
Ines Olevic-Saleh
JESSE SBAIH & ASSOCIATES, LTD.
The District at Green Valley Ranch
170 South Green Valley Parkway, Suite 280
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Attorneys for Plaintiff

By /s/ Anne Cordell
An Employee of LEWIS BRISBOIS BISGAARD
& SMITH LLP

Archived: Monday, December 21, 2020 2:52:46 PM

From: Teegarden, Tara

Sent: Monday, December 21, 2020 2:45:36 PM

To: Cordell, Anne

Cc: Freeman, Robert; Freeman, Kristen; Grames, Cheryl

Subject: FW: [EXT] RE: Desio, Rose v. SFMAIC, et al. -Third SAO to extend

Response requested: No

Sensitivity: Normal

Hi Anne, this needs to be filed today. Will you have time to do it? Thanks.

Tara

Tara U. Teegarden

Attorney

Las Vegas Rainbow

702.693.1716 or x7021716

From: Jesse Sbaih <jsbaih@sbaihlaw.com>

Sent: Monday, December 21, 2020 2:34 PM

To: Teegarden, Tara <Tara.Teegarden@lewisbrisbois.com>

Cc: Cordell, Anne <Anne.Cordell@lewisbrisbois.com>; Freeman, Kristen <Kristen.Freeman@lewisbrisbois.com>; Freeman, Robert <Robert.Freeman@lewisbrisbois.com>; Grames, Cheryl <Cheryl.Grames@lewisbrisbois.com>; Ines <iolevic@sbaihlaw.com>; Jennifer Davidson <jdavidson@sbaihlaw.com>

Subject: [EXT] RE: Desio, Rose v. SFMAIC, et al. -Third SAO to extend

External Email

Hi Tara...it's my pleasure to provide you the extension! Please proceed with filing the attached document with my e-sig.

Happy Holidays!

Jesse M. Sbaih, Esq.

JESSE SBAIH & ASSOCIATES, LTD.

The District at Green Valley Ranch

170 South Green Valley Parkway, Suite 280

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----- Original Message -----

Subject: Desio, Rose v. SFMAIC, et al. -Third SAO to extend
From: "Teegarden, Tara" <Tara.Teegarden@lewisbrisbois.com>
Date: Mon, December 21, 2020 2:12 pm
To: Jesse Sbaih <jsbaih@sbaihlaw.com>
Cc: "Cordell, Anne" <Anne.Cordell@lewisbrisbois.com>, "Freeman, Kristen" <Kristen.Freeman@lewisbrisbois.com>, "Freeman, Robert" <Robert.Freeman@lewisbrisbois.com>, "Grames, Cheryl" <Cheryl.Grames@lewisbrisbois.com>, Ines <iolevic@sbaihlaw.com>, Jennifer Davidson <jdavidson@sbaihlaw.com>

Hi Jesse,

It was nice speaking with you on Friday. Thank you again for providing me with this extension. It is greatly appreciated. I have attached the third draft SAO to extend the briefing schedule for your review. Please let me know if you have any edits you would like made. If not, do I have your permission to use your e-sig?

Sincerely,

Tara



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